CLOSED

U.S. District Court Western District of Louisiana (Shreveport) CRIMINAL DOCKET FOR CASE #: 5:16-cr-00085-EEF-MLH All Defendants

Case title: USA v. Carlisle

Other court case number: 6:15-cr-00004-7 Eastern District of

Date Filed: 04/04/2016

Date Terminated: 12/19/2016

Texas (Tyler)

Assigned to: Judge Elizabeth E

Foote

Referred to: Magistrate Judge Mark

L Hornsby

Defendant (1)

David Wayne Carlisle

TERMINATED: 12/19/2016

also known as

Drop

TERMINATED: 12/19/2016

represented by Charles H Kammer, III

Kammer & Huckabay 820 Jordan St Ste 480 Shreveport, LA 71101 318–222–0293

Fax: 318-425-1644

Email: pete@kandhlawoffice.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED Designation: CJA Appointment

Pending Counts

CONSPIRACY TO DISTRIBUTE NARCOTICS – Conspiracy to possess with intent to distribute and distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance

(1)

CONSPIRACY TO DISTRIBUTE NARCOTICS – Conspiracy to Possess Methamphetamine with Intent to Distribute (1s)

Highest Offense Level (Opening)

Felony

Disposition

Terminated Counts

Disposition

None

<u>Highest Offense Level</u> (Terminated)

None

Complaints

Disposition

None

Plaintiff

USA

represented by **Brandon B Brown**

U S Attorneys Office (SHV) 300 Fannin St Ste 3201 Shreveport, LA 71101–3068 318–676–3600

Fax: 318–676–3663

 $Email: \underline{brandon.brown@usdoj.gov}$

LEAD ATTORNEY

ATTORNEY TO BE NOTICED
Designation: Assistant US Attorney

Date Filed	#	Page	Docket Text
04/04/2016	1	5	CONSENT TO TRANSFER JURISDICTION (Rule 20) from Eastern District of Texas (Tyler) by David Wayne Carlisle (1). (Attachments: #_1 Transfer Notice, #_2 Docket Sheet, #_3 Superseding Indictment, #_4 Indictment, #_5 Letter of Transfer)(crt,Bray, K) (Entered: 04/04/2016)
04/08/2016	2		ELECTRONIC MINUTE ENTRY as to David Wayne Carlisle (1). Initial Appearance and Arraignment is hereby set for 5/5/2016 at 3:30 PM in Shreveport Court House before Judge Elizabeth E Foote. (crt,Keifer, K) (Entered: 04/08/2016)
05/05/2016	3	87	MINUTES for proceedings held before Judge Elizabeth E Foote: INITIAL APPEARANCE and ARRAIGNMENT held on 5/5/2016. The Court suspended the guilty plea hearing. A new CJA attorney will be appointed to represent the defendant. (Court Reporter: Barbara Simpson) (crt,Bray, K) (Entered: 05/09/2016)
05/13/2016	4	88	LETTER by David Wayne Carlisle (1) to Judge Foote (Attachments: #1 Envelope) (crt,Bray, K) (Entered: 05/16/2016)
07/13/2016	5		ELECTRONIC MINUTE ENTRY as to David Wayne Carlisle (1). The Initial Appearance and Arraignment (Guilty Plea) in this case is hereby reset for 7/15/2016 10:30 AM in Shreveport, Courtroom 3 before Magistrate Judge Mark L Hornsby. (crt,Keifer, K) (Entered: 07/13/2016)

07/14/2016	6	91	BILL OF INFORMATION as to David Wayne Carlisle (1) Count 1s. (crt, YocumSld, M) (Entered: 07/19/2016)
07/15/2016	7	92	WAIVER OF INDICTMENT by David Wayne Carlisle (1). (crt, YocumSld, M) (Entered: 07/19/2016)
07/15/2016	8	94	CONSENT TO PLEAD Before US Magistrate Judge in a Felony Case and Waiver of Objection to Report and Recommendation on Guilty Plea by David Wayne Carlisle (1). (crt, YocumSld, M) (Entered: 07/19/2016)
07/15/2016	9	96	MINUTES for proceedings held before Magistrate Judge Mark L Hornsby: INITIAL APPEARANCE and ARRAIGNMENT as to David Wayne Carlisle (1) Count 1s held on 7/15/2016. PLEA ENTERED: Guilty Count 1s. Sentencing set for 10/26/2016 at 01:30 PM before Judge Elizabeth E Foote. Defendant remanded to the custody of the U.S. Marshal pending further proceedings. (Court Reporter: Barbara Simpson) (crt, YocumSld, M) (Entered: 07/19/2016)
07/15/2016	10	98	PLEA AGREEMENT Accepted as to David Wayne Carlisle (1). (Attachments: #_1 Affidavit of understanding, #_2 Factual basis for guilty plea, #_3 Elements of offense) (crt,YocumSld, M) (Entered: 07/19/2016)
07/15/2016	11		ORAL REPORT AND RECOMMENDATIONS on Plea of Guilty as to David Wayne Carlisle (1) by Magistrate Judge Mark L Hornsby on 07/15/2016 recommending that the guilty plea be accepted, and a conviction entered. (crt, YocumSld, M) (Entered: 07/19/2016)
07/15/2016	12		ORAL ORDER OF REFERRAL to Probation for Pre–Sentence Investigation and Report as to David Wayne Carlisle (1) by Magistrate Judge Mark L Hornsby on 07/15/2016. (crt, YocumSld, M) (Entered: 07/19/2016)
09/15/2016	13		NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Proceedings as to David Wayne Carlisle (1) for Change of Plea Hearing held on 7/15/2016 before Judge Mark L. Hornsby. Court Reporter: Barbara A. Simpson, Telephone number: 318.415.8839, Pages: 49. Transcript may be viewed at the court public terminal or purchased through the Court Reporter before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER or the Court Reporter. Redaction Request due 10/11/2016. Redacted Transcript Deadline set for 10/20/2016. Release of Transcript Restriction set for 12/19/2016. (crt,Simpson, B) (Entered: 09/15/2016), (QC'ed on 09/20/2016, by Reeves, T)
10/13/2016	14		ELECTRONIC MINUTE ENTRY as to David Wayne Carlisle (1). A Status Conference will be held in chambers on 10/18/2016 at 10:00 a.m. before Judge Elizabeth E Foote. (crt,Keifer, K) (Entered: 10/13/2016)
10/18/2016	15	111	MINUTES for proceedings held before Judge Elizabeth E Foote: STATUS CONFERENCE as to David Wayne Carlisle (1) held on 10/18/2016. Counsel/Compliance Deadline set for 11/18/2016. Government's Motions due by 10/24/2016. The sentencing hearing set for October 26, 2016 is UPSET. See image for further details and/or deadlines. (crt,Bray, K) (Entered: 10/20/2016)
12/12/2016	16	117	MOTION to Dismiss <i>Bill of Information</i> by USA as to David Wayne Carlisle (1). (Attachments: #_1 Proposed order)(aty,Brown, Brandon) (Entered:

			12/12/2016), (QC'ed on 12/12/2016, by YocumSld, M)
12/19/2016	<u>17</u>	121	ORDER of Transfer of Jurisdiction as to David Wayne Carlisle (1): The Court orders case be transferred to the original district where it was pending as case number 6:15-cr-0004-MHS-KNM in the Tyler Division of the Eastern District of Texas. Signed by Judge Elizabeth E Foote on 12/19/2016. (crt,Bray, K) (Entered: 12/20/2016)

Case 6s155c1-0000004-REFKIND-I/DDbcubreatr656t Filed 42/20/1461 (Page 5eof 852Page 400-142)

Case 6:15-cr-00004-MHS-KNM Document 429 Filed 03/25/16 Page 1 of 1 PageID #: 1214



MAR 2 5 2016

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

BY

		THE SERVICE OF THE PROPERTY OF
·		
OF ARTON	36	CDINATNIAI NIO 15-08-00004-07

UNITED STATES OF AMERICA * CRIMINAL NO. 15-cr-00004-0

•

VERSUS

*

DAVID WAYNE CARLISLE aka "Drop"

* JUDGE SCHNEIDER

* MAGISTRATE JUDGE MITCHELL

RULE 20 CONSENT TO TRANSFER

I, DAVID WAYNE CARLISLE aka "Drop", defendant, have been informed that an indictment is pending against me in the above designated case. I wish to plead guilty to count 1 of the Indictment, consent to the disposition of the case in the WESTERN DISTRICT OF LOUISIANA, and waive trial in the above captioned District.

aday of <u>Decambor</u> 2015 at Shreeport, Louisiana.

David Wayne Carlisle, Defendant

(Witness)

Marak, Counsel for Defendant

A TRUE COPY I CERTIFY DAVID A. O'TOOLE, CLERK U.S. DISTRICT COURT

EASTERN DISTRICT OF TEXAS

APPROVED

JOHN MALCOLM BALES

Betty

United States Attorney

Eastern District of Texas

By: Richard Moore

Assistant United States Attorney

STEPHANIE A. FINLEY

United States Attorney

Western District of Louisiana

By: Brandon B. Brown

Assistant United States Attorney

Case:6:15:c6:0000049RGHKNHM LDDocumentr656 1 Filedi 1:2/20/1061/1Page:6j of 1852FlagetDitte 2832

Case 6:15-cr-00004-MHS-KNM Document 429-1 Filed 03/25/16 Page 1 of 1 PageID #: 1215

U.S. Dep	artment of Justice	Rule 20 Transfer Notice				
To: R	RICHARD MOORE,ASSISTANT U.S. ATTORNEY	District Eastern District of Texas	Date 3/23/2016			
Name of S	ubject: DAVID WAYNE CARLISLE AKA "DROP"	Statute Violated 21 U.S.C. §846	File Data (Initials and Number)			
	Part A Dis	strict of Arrest				
\boxtimes	The above-named subject has been apprehended in this jur of the changes pending against him in your court. Kindly is and forward two certified copies of indictment or informati	ndicate whether you are agreeable to	o Rule 20 disposition Rule 20 disposition			
	Enclosed is a certified copy of waiver of indictment by defendant. Kindly file criminal information and forward two certified copies thereof.					
\boxtimes	Enclosed is Consent to Transfer form executed in duplicate (one copy for your files) by defendant and the United States Attorney in the district of arrest. Kindly add your consent and have the Clerk of your district transmit the papers in the proceeding or certified copies thereof to the Clerk of the Court in this district in accordance with the Rule Docket No.					
	Other (Specify):					
	The above-named defendant entered a plea of guilty under Date of Plea Date of Sentence Senter					
From (Sign	nature and Title)		ess United States Attorney's Office			
D	la Q Bre Assistant U.S. Attorne	300 Fannin St., Suite 3201 Shreveport, LA 71101				
Bran	Aon B. Brown					
Salles	Part B Distri	ict of Offense				
\boxtimes	I am agreeable to Rule 20 disposition.					
	I am not agreeable to Rule 20 disposition. Defendant's app	on at	o'clock			
\boxtimes	(Kindly notify me of any anticipated delay) Enclosed are two certified copies of indictment or information	Docket No. 6:15CR00004-07	· ·			
	Please have defendant execute waiver of indictment.					
	Other (Specify):					
Signature (1	Name and Title)	District Eastern District of Texas	5-24-2016			

See United States Attorneys Manual 9-14.000 for an explanation of procedures under Rules 7 & 20, Federal Rules of Criminal Procedure.

Replaces OBD-101, Fed. 83 edition may be used

U.S. District Court [LIVE] Eastern District of TEXAS (Tyler) CRIMINAL DOCKET FOR CASE #: 6:15-cr-00004-MHS-KNM-7

Case title: USA v. Bonner et al

Date Filed: 01/21/2015

Date Terminated: 03/25/2016

Assigned to: Judge Michael H.

Schneider

Referred to: Magistrate Judge K. Nicole

Mitchell

Defendant (7)

David Wayne Carlisle

TERMINATED: 03/25/2016

also known as

Drop

TERMINATED: 03/25/2016

Pending Counts

None

Disposition

Highest Offense Level (Opening)

None

Terminated Counts

CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE AND DISTRIBUTION OF 500 GRAMS OR MORE OF A MIXTURE OR SUBSTANCE CONTAINING A DETECTABLE AMOUNT OF METHAMPHETAMINE, A SCHEDULE II CONTROLLED SUBSTANCE (1)

CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE AND DISTRIBUTION OF 500 GRAMS OR MORE OF A MIXTURE OR SUBSTANCE CONTAINING A DETECTABLE AMOUNT OF METHAMPHETAMINE, A

Disposition

A TRUE COPY I CERTIFY
DAVID A. O'TOOLE, CLERK
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

SCHEDULE II CONTROLLED SUBSTANCE (1s)

Highest Offense Level (Terminated)

Felony

Complaints

None

Disposition

Plaintiff

USA

represented by Richard Lee Moore

US Attorney's Office 110 N College Suite 700 Tyler, TX 75702 903/590-1400 Fax: 9035901439

Email: richard.moore2@usdoj.gov

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
01/21/2015	1	SEALED INDICTMENT as to Michael Dain Bonner (1) count(s) 1, 13, 14, 25, 26, David Franklin Beck, Jr (2) count(s) 1, 15, 16, 35, 36, Michael Dewayne Jones (3) count(s) 1, Stephen Dwayne Cannada (4) count(s) 1, 8, 9, 12, Cynthia Beth Brantley (5) count(s) 1, 6, Devon Vernon Harris (6) count(s) 1, 3, 4, David Wayne Carlisle (7) count(s) 1, Broderick Lamail Jones (8) count(s) 1, 29, Katlin Quatez Godfrey (9) count(s) 1, Troy Owen, Jr (10) count(s) 1, Mark Cyrus Hipp (11) count(s) 1, 7, Christopher Everett Brook (12) count(s) 1, 2, 19, 20, Keith Deondray Young (13) count(s) 1, 31, 32, 33, 34, Larry Gene Keen (14) count(s) 1, 10, 11, 17, 18, 21, 22, 30, Carla Thomas Hawkins (15) count(s) 1, 23, 24, Courtney Breanne McMullen (16) count(s) 1, 27, 28, Chase Anthony Hagler (17) count(s) 1, Andre Lamont Williams (18) count(s) 1, 5, Jessica Milleson (19) count(s) 1, Heather Rebecca Beck (20) count(s) 1, 37. (mjc,) (Entered: 01/22/2015)
01/21/2015	9	E-GOV SEALED Form AO 257 filed as to David Wayne Carlisle. (mjc,) (Entered: 01/22/2015)
02/05/2015	<u>52</u>	MOTION to Unseal Indictment by USA as to Michael Dain Bonner, David Franklin Beck, Jr, Michael Dewayne Jones, Stephen Dwayne Cannada, Cynthia Beth Brantley, Devon Vernon Harris, David Wayne Carlisle, Broderick Lamail Jones, Katlin Quatez Godfrey, Troy Owen, Jr, Mark

	6). A	
		Cyrus Hipp, Christopher Everett Brook, Keith Deondray Young, Larry Gene Keen, Carla Thomas Hawkins, Courtney Breanne McMullen, Chase Anthony Hagler, Andre Lamont Williams, Jessica Milleson, Heather Rebecca Beck. (Attachments: # 1 Text of Proposed Order)(mjc,) (Entered: 02/05/2015)
02/05/2015	<u>53</u>	ORDER granting 52 Motion to Unseal Indictment re 52 MOTION to Unseal Indictment as to Michael Dain Bonner (1), David Franklin Beck Jr. (2), Michael Dewayne Jones (3), Stephen Dwayne Cannada (4), Cynthia Beth Brantley (5), Devon Vernon Harris (6), David Wayne Carlisle (7), Broderick Lamail Jones (8), Katlin Quatez Godfrey (9), Troy Owen Jr. (10), Mark Cyrus Hipp (11), Christopher Everett Brook (12), Keith Deondray Young (13), Larry Gene Keen (14), Carla Thomas Hawkins (15), Courtney Breanne McMullen (16), Chase Anthony Hagler (17), Andre Lamont Williams (18), Jessica Milleson (19), Heather Rebecca Beck (20). Signed by Magistrate Judge John D. Love on 2/5/15. (mjc,) (Entered: 02/05/2015)
03/06/2015	230	NOTICE of Bill of Particulars by USA as to Michael Dain Bonner, David Franklin Beck, Jr, Michael Dewayne Jones, Stephen Dwayne Cannada, Cynthia Beth Brantley, Devon Vernon Harris, David Wayne Carlisle, Broderick Lamail Jones, Katlin Quatez Godfrey, Troy Owen, Jr, Mark Cyrus Hipp, Christopher Everett Brook, Keith Deondray Young, Larry Gene Keen, Carla Thomas Hawkins, Courtney Breanne McMullen, Chase Anthony Hagler, Andre Lamont Williams, Jessica Milleson, Heather Rebecca Beck (Moore, Richard) (Entered: 03/06/2015)
03/17/2015	240	NOTICE of Amended Bill of Particulars by USA as to Michael Dain Bonner, David Franklin Beck, Jr, Michael Dewayne Jones, Stephen Dwayne Cannada, Cynthia Beth Brantley, Devon Vernon Harris, David Wayne Carlisle, Broderick Lamail Jones, Katlin Quatez Godfrey, Troy Owen, Jr, Mark Cyrus Hipp, Christopher Everett Brook, Keith Deondray Young, Larry Gene Keen, Carla Thomas Hawkins, Courtney Breanne McMullen, Chase Anthony Hagler, Andre Lamont Williams, Jessica Milleson, Heather Rebecca Beck (Moore, Richard) (Entered: 03/17/2015)
08/19/2015	282	SUPERSEDING INDICTMENT as to Michael Dain Bonner (1) count(s) 1s, 13s, 14s, 25s, 26s, David Franklin Beck, Jr (2) count(s) 1s, 15s, 16s, 35s, 36s, 39s, 41s, 43s, Michael Dewayne Jones (3) count(s) 1s, 38s, Stephen Dwayne Cannada (4) count(s) 1s, 8s, 9s, 12s, Cynthia Beth Brantley (5) count(s) 1s, 6s, Devon Vernon Harris (6) count(s) 1s, 3s, 4s, David Wayne Carlisle (7) count(s) 1s, Broderick Lamail Jones (8) count(s) 1s, 29s, Katlin Quatez Godfrey (9) count(s) 1s, Troy Owen, Jr (10) count(s) 1s, Mark Cyrus Hipp (11) count(s) 1s, 7s, Christopher Everett Brook (12) count(s) 1s, 2s, 19s, 20s, Keith Deondray Young (13) count(s) 1s, 31s, 32s, 33s, 34s, Larry Gene Keen (14) count(s) 1s, 10s, 11s, 17s, 18s, 21s, 22s, 30s, Carla Thomas Hawkins (15) count(s) 1s, 23s, 24s, Courtney Breanne McMullen (16) count(s) 1s, 27s, 28s, Chase Anthony Hagler (17) count(s) 1s, Andre Lamont Williams (18) count(s) 1s, 5s, Jessica Milleson (19) count(s) 1s, Heather Rebecca Beck (20) count(s) 1s, 37s, 40s, 42s-43s. (mjc,) (Entered: 08/20/2015)

03/25/2016	CONSENT TO TRANSFER JURISDICTION (Rule 20) to Western District of Louisiana Counts closed as to David Wayne Carlisle (7) Count 1s,1.
	(Attachments: # 1 Transfer Notice)(mjc,) (Entered: 03/30/2016)

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

UNITED STATES OF AMERICA	S
V.	8
	8
MICHAEL DAIN BONNER (01)	S
DAVID FRANKLIN BECK, JR. (02)	S
MICHAEL DEWAYNE JONES,	§
aka "Sleepy" (03)	§
STEPHEN DWAYNE CANNADA, (04)	§
aka "Little Wood"	§
CYNTHIA BETH BRANTLEY (05)	§
DEVON VERNON HARRIS, aka "Cali" (06)	§
DAVID WAYNE CARLISLE, (07)	§
aka "Drop"	§
BRODERICK LAMAIL JONES, (08)	§
aka "BA"	§
KATLIN QUATEZ GODFREY, (09)	§
aka "Slim/KG"	§
TROY OWEN, JR. (10)	§
MARK CYRUS HIPP (11)	§
CHRISTOPHER EVERETT BROOK, (12)	§
aka "Blue"	§
KEITH DEONDRAY YOUNG, (13)	§
aka "Tugg"	§
LARRY GENE KEEN, aka "Junior" (14)	§
CARLA THOMAS HAWKINS, (15)	§
aka "Breeze"	§
COURTNEY BREANNE MCMULLEN (16)	§ §
CHASE ANTHONY HAGLER (17)	§
ANDRE LAMONT WILLIAMS, (18)	9000
aka "Dre"	§
JESSICA MILLESON (19)	
HEATHER REBECCA BECK (20)	S

U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

AUG 1 9 2015

DAVID J. MALAND, CLERK
BY
DEPUTY

CRIMINAL NO. 6:15CR4

JUDGE SCHNEIDER

SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Superseding Indictment - Page 1

A TRUE COPY I CERTIFY
DAVID A. O'TOOLE, CLERK
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
By:

COUNT ONE

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to distribute and distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance)

Beginning on or about January, 2010, the exact date being unknown to the United States Grand Jury, and continuing thereafter until at least the date of the return of this superseding indictment, in the Eastern District of Texas, Michael Dain Bonner, David Franklin Beck, Jr., Michael Dewayne Jones, aka "Sleepy," Stephen Dwayne Cannada, aka "Little Wood," Cynthia Beth Brantley, Devon Vernon Harris, aka "Cali," David Wayne Carlisle, aka "Drop," Broderick Lamail Jones, aka "BA," Katlin Quatez Godfrey, aka "Slim/KG," Troy Owen, Jr., Mark Cyrus Hipp, Christopher Everett Brook, aka "Blue," Keith Deondray Young, aka "Tugg," Larry Gene Keen, aka "Junior," Carla Thomas Hawkins, aka "Breeze," Courtney Breanne McMullen, Chase Anthony Hagler, Andre Lamont Williams, aka "Dre," Jessica Milleson and Heather Rebecca Beck, the defendants herein, did knowingly, intentionally and unlawfully, combine, conspire, confederate, and agree with each other and with others, both known and unknown to the United States Grand Jury, to violate a law of the United States of America, to wit, 21 U.S.C. § 841(a)(1), prohibiting the possession with intent to distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance, as set forth hereinafter.

COUNT TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about February 6, 2010, in the Eastern District of Texas, **Christopher Everett Brook**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Forgery, in Cause # 26519-B, 124th Judicial District Court, Gregg County, Texas, on October 18, 1999;
- (2) Criminal mischief over \$1,500, in Cause # 28618-A, 188th Judicial District Court, Gregg County, Texas, on April 12, 2002; and
- (3) Hindering apprehension, in Cause # 241-1544-06, 241st Judicial District Court, Smith County, Texas, on November 2, 2007,

did knowingly and intentionally possess a firearm, to wit:

a Ruger, model P89DC, 9mm pistol, serial number 307-16743, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 5, 2013, in the Eastern District of Texas, **Devon Vernon Harris, aka "Cali,"** the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be

Superseding Indictment - Page 3

prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 5, 2013, in the Eastern District of Texas, **Devon Vernon Harris, aka "Cali,"** the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Possession of a controlled substance , in Cause # 26800-A, 188th Judicial District Court, Gregg County, Texas, on August 14, 2000

did knowingly and intentionally possess firearms, to wit:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

which had been shipped and transported in interstate commerce,

COUNT FIVE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 5, 2013, in the Eastern District of Texas, Andre Lamont Williams, aka "Dre," the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT SIX

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about March 17, 2014, in the Eastern District of Texas, **Cynthia Beth Brantley**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

Superseding Indictment - Page 5

- (1) Theft of property over \$1500, in Cause # 29151-B, 124th Judicial District Court, Gregg County, Texas, on April 5, 2002;
- (2) Delivery of a controlled substance, in Cause # 32293-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005;
- (3) Delivery of a controlled substance, in Cause # 32295-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005;
- (4) Delivery of a controlled substance, in Cause # 32297-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005; and
- (5) Possession of a controlled substance, in Cause # 36331-B, 124th Judicial District Court, Gregg County, Texas, on April 11, 2008,

did knowingly and intentionally possess a firearm, to wit:

a Davis Industries, T380, .380 caliber pistol, serial number AP52840, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT SEVEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about April 2, 2014, in the Eastern District of Texas, Mark Cyrus Hipp, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

(1) Burglary of a building, in Cause # 98-H-157-SJ, 23rd Judicial District Court, Matagorda County, Texas, on November 10, 1999, with order revoking probation;

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- (2) Forgery, in Cause # 99-H-124-SJ, 23rd Judicial District Court, Matagorda County, Texas, on July 8, 1999, with order revoking probation; and
- (3) Failure to stop and render aid, in Cause # 99-06-8380, 25th Judicial District Court, Lavaca County, Texas, on July 18, 2000,

did knowingly and intentionally possess a firearm, to wit:

an RG, RG38, .38 caliber revolver, serial number FF371879, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT EIGHT

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about April 21, 2014, in the Eastern District of Texas, Stephen Dwayne Cannada, aka "Little Wood" the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Ruger, SR9, 9mm pistol, serial number 334-63439, together with ammunition, In violation of 18 U.S.C. § 924(c)(1)(B).

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COUNT NINE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about April 21, 2014, in the Eastern District of Texas, **Stephen Dwayne Cannada, aka "Little Wood,"** the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Delivery of a simulated controlled substance, in Cause #2040120, 147th Judicial District Court, Travis County, Texas, on May 4, 2004;
- (2) Robbery, in Cause # F-0859241-J, Criminal District Court # 3, Dallas County, Texas, on February 25, 2009; and
- (3) Possession of a controlled substance, in Cause #41979-B, 124th Judicial District Court, Gregg County, Texas, on May 2, 2013,

did knowingly and intentionally possess a firearm, to wit:

a Ruger, SR9, 9mm pistol, serial number 334-63439, together with ammunition, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about May 24, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

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Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, serial number NE309621,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT ELEVEN

Violation: 26 U.S.C. § 5861(d) (Possession of unregistered firearm)

On or about May 24, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," defendant herein, did knowingly and intentionally possess an unregistered firearm, to-wit:

A New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, serial number NE309621,

not registered to him in the National Firearms Registration and Transfer Record,

In violation of 26 U.S.C. §§ 5841, 5861(d) and 5871.

COUNT TWELVE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about July 12, 2014, in the Eastern District of Texas, **Stephen Dwayne**Cannada, aka "Little Wood," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Delivery of a simulated controlled substance, in Cause #2040120, 147th Judicial District Court, Travis County, Texas, on May 4, 2004;
- (2) Robbery, in Cause # F-0859241-J, Criminal District Court # 3, Dallas County, Texas, on February 25, 2009; and
- (3) Possession of a controlled substance, in Cause #41979-B, 124th Judicial District Court, Gregg County, Texas, on May 2, 2013,

did knowingly and intentionally possess a firearm, to wit:

a Jimenez Arms, JA22, .22 caliber pistol, serial number 1205360, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 6, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, did knowingly and intentionally use, carry, and possess a

firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Taurus, PT111 Millenium Pro, 9mm pistol, serial number TDR40332, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FOURTEEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 6, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Attempted violation of protective order, in Cause #32218-B, 124th Judicial District Court, Gregg County, Texas, on October 28, 2004; and
- (2) Possession with intent to distribute methamphetamine, in Cause #6:09CR9-08, United States District Court, Eastern District of Texas, on February 5, 2010,

did knowingly and intentionally possess a firearm, to wit:

a Taurus, PT111 Millenium Pro, 9mm pistol, serial number TDR40332, which had been shipped and transported in interstate commerce,

COUNT FIFTEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 8, 2014, in the Eastern District of Texas, **David Franklin Beck**, **Jr.**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT SIXTEEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 8, 2014, in the Eastern District of Texas, **David Franklin Beck**, **Jr.**, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Sexual assault, child, in Cause # F-9832508-KR, 265th Judicial District Court, Dallas, Texas, on February 16, 2001,

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did knowingly and intentionally possess a firearm, to wit:

a Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT SEVENTEEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 17, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Remington, 870, 12 gauge short barrel shotgun, serial number D019337M, together with ammunition,

which had been shipped and transported in interstate commerce,

COUNT EIGHTEEN

Violation: 26 U.S.C. § 5861(d) (Possession of unregistered firearm)

On or about August 17, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," defendant herein, did knowingly and intentionally possess an unregistered firearm, to-wit:

a Remington, 870, 12 gauge short barrel shotgun, serial number D019337M, together with ammunition,

not registered to him in the National Firearms Registration and Transfer Record,

In violation of 26 U.S.C. §§ 5841, 5861(d) and 5871.

COUNT NINETEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 16, 2014, in the Eastern District of Texas, Christopher Everett Brook, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, **Christopher Everett Brook**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Forgery, in Cause # 26519-B, 124th Judicial District Court, Gregg County, Texas, on October 18, 1999;
- (2) Criminal mischief over \$1,500, in Cause # 28618-A, 188th Judicial District Court, Gregg County, Texas, on April 12, 2002;
- (3) Hindering apprehension, in Cause # 241-1544-06, 241st Judicial District Court, Smith County, Texas, on November 2, 2007;
- (4) Possession of a controlled substance, in Cause # 39397-B, 124th Judicial District Court, Gregg County, Texas, on May 21, 2010; and
- (5) Possession of a controlled substance, in Cause # 10-0287X, 71st Judicial District Court, Harrison County, Texas, on August 4, 2010,

did knowingly and intentionally possess a firearm, to wit:

a Bryco, model 48, .380 pistol, serial number 567598,

which had been shipped and transported in interstate commerce,

COUNT TWENTY-ONE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 16, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

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a Bryco, model 48, .380 pistol, serial number 567598,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-THREE

Violation: 18 U.S.C. § 924(c)

(Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking

crime)

On or about September 16, 2014, in the Eastern District of Texas, Carla Thomas

Hawkins, aka "Breeze," the defendant herein, did knowingly and intentionally use, carry,

and possess a firearm during and in relation to a drug trafficking crime for which she may

be prosecuted in a court of the United States, that is possession with intent to distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, as charged in Count One of this superseding indictment, in violation

of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, **Carla Thomas Hawkins**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (a) Possession of a controlled substance, in Cause # 007-2207-03, 7th Judicial District Court, Smith County, Texas, on February 26, 2007; and
- (b) Credit card abuse, in Cause # 41802-A, 188th Judicial District Court, Gregg County, Texas, on October 2, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Bryco, model 48, .380 pistol, serial number 567598, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-FIVE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 23, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-SIX

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 23, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Attempted violation of protective order, in Cause #32218-B, 124th Judicial District Court, Gregg County, Texas, on October 28, 2004; and
- (2) Possession with intent to distribute methamphetamine, in Cause #6:09CR9-08, United States District Court, Eastern District of Texas, on February 5, 2010,

did knowingly and intentionally possess firearms, to wit:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

which had been shipped and transported in interstate commerce,

COUNT TWENTY-SEVEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 23, 2014, in the Eastern District of Texas, **Courtney Breanne McMullen**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-EIGHT

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 23, 2014, in the Eastern District of Texas, **Courtney Breanne McMullen**, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Theft with prior conviction (revoking probation), in Cause #41441-B, 124th Judicial District Court, Gregg County, Texas, on June 6, 2014,

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did knowingly and intentionally possess firearms, to wit:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-NINE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about October 21, 2014, in the Eastern District of Texas, **Broderick Lamail**Jones, aka "BA," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Possession of a controlled substance, in Cause # 14025, 115th Judicial District Court, Upshur County, Texas, on August 25, 2009; and
- (2) Manufacture/Delivery of a controlled substance, in Cause # 15227, 115th Judicial District Court, Upshur County, Texas, on August 25, 2009,

did knowingly and intentionally possess a firearm, to wit:

a Raven Arms, MP25, .25 caliber pistol, serial number 935862,

which had been shipped and transported in interstate commerce,

COUNT THIRTY

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about October 30, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Boito, 410 shotgun, 26" overall, 18" barrel, serial number 443593, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY-ONE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about November 6, 2014, in the Eastern District of Texas, **Keith Deondray Young, aka "Tugg,"** the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about November 6, 2014, in the Eastern District of Texas, **Keith Deondray Young, aka "Tugg,"** the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Theft of a firearm, in Cause # 25878-A, 188th Judicial District Court, Gregg County, Texas, on December 7, 1999;
- (2) Credit card abuse, in Cause # 33822-A, 188th Judicial District Court, Gregg County, Texas, on January 17, 2006;
- (3) Possession of a controlled substance, in Cause # 35552-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007;
- (4) Assault family violence (enhanced), in Cause # 35575-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007; and
- (5) Delivery of a controlled substance, in Cause # 41194-A, 188th Judicial District Court, Gregg County, Texas, on May 24, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

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which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY-THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about November 19, 2014, in the Eastern District of Texas, **Keith Deondray Young, aka "Tugg,"** the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about November 19, 2014, in the Eastern District of Texas, **Keith Deondray Young, aka "Tugg,"** the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Theft of a firearm, in Cause # 25878-A, 188th Judicial District Court, Gregg County, Texas, on December 7, 1999;
- (2) Credit card abuse, in Cause # 33822-A, 188th Judicial District Court, Gregg County, Texas, on January 17, 2006;
- (3) Possession of a controlled substance, in Cause # 35552-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007;
- (4) Assault family violence (enhanced), in Cause # 35575-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007; and
- (5) Delivery of a controlled substance, in Cause # 41194-A, 188th Judicial District Court, Gregg County, Texas, on May 24, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

which had been shipped and transported in interstate commerce,

COUNT THIRTY-FIVE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about December 15, 2014, in the Eastern District of Texas, **David Franklin Beck, Jr.**, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Sexual assault, child, in Cause # F-9832508-KR, 265th Judicial District Court, Dallas, Texas, on February 16, 2001,

did knowingly and intentionally possess firearms, to wit:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;
- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and
- (12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

which had been shipped and transported in interstate commerce,

COUNT THIRTY-SIX

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about December 15, 2014, in the Eastern District of Texas, **David Franklin Beck, Jr.**, the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;
- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and

(12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-SEVEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about December 15, 2014, in the Eastern District of Texas, **Heather Rebecca Beck**, the defendant herein, did knowingly and intentionally use, carry, and possess

firearms during and in relation to a drug trafficking crime for which she may be

prosecuted in a court of the United States, that is possession with intent to distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, as charged in Count One of this superseding indictment, in violation

of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;

- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and
- (12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-EIGHT

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about February 5, 2015, in the Eastern District of Texas, **Michael Dewayne Jones, aka "Sleepy,"** the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) a Ruger, SR45, .45 caliber pistol, serial number 380-55190, together with ammunition; and
- (2) a Norinco, 7.62x39 assault rifle, serial number 7509642,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-NINE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about July 18, 2014, in the Eastern District of Texas, **David Franklin Beck Jr.** the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FORTY

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about July 18, 2014, in the Eastern District of Texas, **Heather Rebecca Beck**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

(1) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;

Or

(2) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FORTY-ONE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 17, 2014, in the Eastern District of Texas, **David Franklin Beck Jr.**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed a firearm, the make and model unknown to the United States Grand Jury.

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FORTY-TWO

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 17, 2014, in the Eastern District of Texas, **Heather Rebecca Beck**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed a firearm, the make and model unknown to the United States Grand Jury.

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FORTY-THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about January 19, 2015, in the Eastern District of Texas, **Heather Rebecca Beck**, the defendant herein, aided and abetted by **David Franklin Beck**, **Jr**, did

knowingly and intentionally use, carry, and possess a firearm during and in relation to a

drug trafficking crime for which she may be prosecuted in a court of the United States,

that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this superseding indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

an Israel Weapon Ind.-IWI, Desert Eagle, .45 caliber pistol, serial number C001965, together with a magazine and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B) and 18 U.S.C. § 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE Pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, & 28 U.S.C. §2461

As the result of committing one or more of the foregoing offenses alleged in this superseding indictment, the defendants herein shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461:

- 1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violations;
- 2. any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and/or;
- 3. any and all firearms, ammunition and accessories seized from the defendants, including but not limited to the following:

Seized from David Beck:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, SN DWH7388, together with two (2) magazines and ammunition
- (2) Winchester, model 50, 12 gauge shotgun, SN 53383, together with ammunition
- (3) High Standard, model DM-101, .22 caliber derringer, SN1831704, together with ammunition

- (4) Ruger, Mark I, .22 caliber pistol, SN 1398484, together with magazines and ammunition
- (5) Navy Arms, 12 gauge shotgun, SN 109308
- (6) Savage Arms, model 93R17, .17 caliber rifle, SN 903025, together with magazines and ammunition
- (7) .38 caliber revolver, manufactured in Belgium
- (8) Ruger, model Single Six, .22 caliber revolver, SN 66-96564
- (9) Smith & Wesson, model SW9VE, 9mm pistol, SN DVB2033, together with magazines and ammunition
- (10) Colt, model M4, .22 caliber assault rifle, SN BP085392, together with magazines and ammunition
- (11) 13 rounds of 12 gauge ammunition
- (12) 355 rounds of .22 caliber ammunition
- (13) 1262 rounds of various caliber ammunition
- (14) 11 rounds with two magazines of .223 caliber ammunition
- (15) 15 rounds of Winchester-Western 9mm ammunition
- (16) 50 rounds of Federal .22 caliber ammunition
- (17) 3 rounds of Winchester-Western 12-gauge ammunition
- (18) 22 rounds of CCI .22 caliber ammunition
- (19) 56 rounds of assorted ammunition
- (20) 29 rounds of Remington .22 caliber ammunition
- (21) 4 rounds of Hornady .17 caliber ammunition
- (22) 5 rounds of assorted .38 caliber ammunition
- (23) 10 rounds of Winchester-Western .22 caliber ammunition

Seized from Michael Dewayne Jones, aka "Sleepy"

- (1) Ruger SR45, .45 caliber pistol, SN 380-55190
- (2) Ten (10) rounds of Winchester-Western .45 caliber ammunition
- (3) Norinco, Sporter, 7.62x39 assault rifle, SN 7509642
- (4) One (1) round of Winchester-Western 12 gauge ammunition
- (5) 89 rounds of Winchester Western .45 caliber ammunition
- (6) Winchester shotgun, SN L784621

Seized from Stephen Cannada, aka "Little Wood"

- (1) Smith and Wesson, model 10, .38 caliber revolver, with an obliterated SN
- (2) Smith and Wesson, model 10, .38 caliber revolver, SN C774147
- (3) Jimenez Arms, JA22, .22 caliber pistol, SN 1205360, together with ammunition
- (4) Ruger, SR9, 9mm pistol, SN 334-63439, together with ammunition

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Seized from Cynthia Brantley

Davis Industries, T380, .380 caliber pistol, SN AP52840, together with ammunition

Seized from Katlin Quatez Godfrey

- (1) Taurus, PT140 Millenium Pro, .40 caliber pistol, SN SBS64924
- (2) Ten (10) rounds of Remington .40 caliber ammunition
- (3) 83 rounds of Remington assorted ammunition
- (4) One (1) round of Remington 9mm ammunition

Seized from Devon Harris, aka "Cali"

- (1) Sun Dance Industries, .22 caliber handgun, SN D001237
- (2) Cobray, M12, .380 Uzi type handgun, SN 12-0001141
- (3) Six (6) magazines containing 71 rounds of 9mm ammunition

Seized from Keith Deondray Young, aka "Tugg"

- (1) Glock GMBH 27, .40 caliber pistol, SN LWN777
- (2) Three (3) rounds Tula Cartridge Works Russia, .40 caliber ammunition

Seized from Larry Keen, aka "Junior"

- (1) Remington, 870, 12 gauge short barrel shotgun, SN D019337M, together with ammunition
- (2) New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, SN NE309621

Seized from Carla Thomas Hawkins

- (1) Beretta, model 20, .25 caliber pistol, SN BE01871V
- (2) 38 rounds of 7.62x39 ammunition
- (3) 33 rounds of .38 caliber ammunition
- (4) Five (5) rounds of .25 caliber ammunition

Seized from Heather Rebecca Beck

Seven (7) rounds of .45 caliber ammunition

U. S. CURRENCY:

- (1) \$5,230.00 in U. S. currency, seized from **David Beck**
- (2) \$3,852.00 in U.S. currency seized from Michael Dewayne Jones, aka "Sleepy"
- (3) \$2,225.00 in U. S. currency seized from Katlin Quatez Godfrey

CASH PROCEEDS:

\$200,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is property constituting, or derived from, proceeds obtained directly or indirectly as the result of the offenses alleged in the superseding indictment.

Case 6: 15-6r-000000 REFERM M4 | DOBUMENTOS 6 - FILE d'912/20/2461 Page 947 of 85 49ag 6 10 13 14 23 23

Case 6:15-cr-00004-MHS-KNM Document 282 Filed 08/19/15 Page 37 of 40 PageID #: 691

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this superseding indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461.

A TRUE BILL

GRAND JURY FOREPERSON

JOHN M. BALES

UNITED STATES ATTORNEY

RICHARD L. MOORE

Assistant United States Attorney

110 N. College, Suite 700

Tyler, Texas 75702

(903) 590-1400

(903) 590-1439 (fax)

8-19-2015

Date

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

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UNITED STATES OF AMERICA	§	
**	8	
V.	8	
MICHAEL DAIN DONNED (01)	<i>\$</i> \$\tap{\tilde{\tilie}\tilde{\tilde{\tilde{\tilde{\tilde{\tilde{\tilde{\tilde	
MICHAEL DAIN BONNER (01)		
DAVID FRANKLIN BECK, JR. (02)	§	
MICHAEL DEWAYNE JONES,	§	
aka "Sleepy" (03)	§	
STEPHEN DWAYNE CANNADA, (04)	§	
aka "Little Wood"	§ §	
CYNTHIA BETH BRANTLEY (05)		
DEVON VERNON HARRIS, aka "Cali" (06)	§	
DAVID WAYNE CARLISLE, (07)	§	
aka "Drop"	§	CRIMINAL NO. 6:15CR4
BRODERICK LAMAIL JONES, (08)	§	
aka "BA"	§	JUDGE SCHNEIDER
KATLIN QUATEZ GODFREY, (09)	§	
aka "Slim/KG"	§	
TROY OWEN, JR. (10)	§	
MARK CYRUS HIPP (11)	§	
CHRISTOPHER EVERETT BROOK, (12)	§	
aka "Blue"	§	
KEITH DEONDRAY YOUNG, (13)	§	•
aka "Tugg"	§	
LARRY GENE KEEN, aka "Junior" (14)	<i>\$\tag{\tau}\tau\tau\tau\tau\tau\tau\tau\tau\tau\tau</i>	
CARLA THOMAS HAWKINS, (15)	§	
aka "Breeze"	§	
COURTNEY BREANNE MCMULLEN (16)	§	
CHASE ANTHONY HAGLER (17)	§	
ANDRE LAMONT WILLIAMS, (18)	§	
aka "Dre"	§	
JESSICA MILLESON (19)	<i>\$\tag{\tau}\tau\tau\tau\tau\tau\tau\tau\tau\tau\tau</i>	
HEATHER REBECCA BECK (20)	§	

NOTICE OF PENALTY

COUNT 1

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to

distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance)

Penalty: Imprisonment for a term of not less than 10 years or

more than life, a fine not to exceed \$10,000,000, or both. A term of supervised release of at least 5 years in

addition to such term of imprisonment.

Special Assessment: \$100.00

COUNTS 3, 5, 6, 9, 14, 16, 20, 22, 24, 26, 28, 32, 34, 37, 38, 39, 40, 41, 42 & 43

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a

firearm during and in furtherance of a drug trafficking

crime)

Penalty: Imprisonment for a term of not less than 5 years or more

than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed

\$250,000, or both. A term of supervised release of not

more than 5 years in addition to such term of

imprisonment.

In the case of a second or subsequent conviction of this offense, the term of imprisonment shall not be less than

rense, the term of imprisonment shall not be

25 years.

Special Assessment:

\$100.00

Cases 6:15-6r-0000048 REEKINMH HDo Dumente 658-3-Filed et 2/20/1/61 (Page 5504 of 85/19age et 13#2 287 6

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COUNTS 2, 4, 7, 8, 10, 11, 13, 15, 17, 18, 21, 23, 25, 27, 29, 30, 31, 33, 35, 36 & 38

Violation:

18 U.S.C. § 922(g)(1) (Felon in Possession of a

Firearm)

Penalty:

Imprisonment for a term of not more than 10 years, a

fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years in addition

to such term of imprisonment.

Special Assessment:

\$100.00

COUNTS 12 & 19

Violation:

26 U.S.C. § 5861(d) (Possession of an Unregistered

Firearm)

Penalty:

Imprisonment for a term of not more than 10 years, a

fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years in addition

to such term of imprisonment.

Special Assessment:

\$100.00

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IN THE UNITED STATES DISTRICT	COURT
FOR THE EASTERN DISTRICT OF T	EXAS
TYLER DIVISION	E

U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS

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JAN 2 1 2015

AVID J. MALAND, CLERK JTY_____

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Indictment - Page 1

A TRUE COPY I CERTIFY DAVID A. O'TOOLE, CLERK U.S. DISTRICT COURT EASTERN DISTRICT OF TEXAS

COUNT ONE

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to distribute and distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance)

Beginning on or about January, 2010, the exact date being unknown to the United States Grand Jury, and continuing thereafter until at least the date of the return of this indictment, in the Eastern District of Texas, Michael Dain Bonner, David Franklin Beck, Jr., Michael Dewayne Jones, aka "Sleepy," Stephen Dwayne Cannada, aka "Little Wood," Cynthia Beth Brantley, Devon Vernon Harris, aka "Cali," David Wayne Carlisle, aka "Drop," Broderick Lamail Jones, aka "BA," Katlin Quatez Godfrey, aka "Slim/KG," Troy Owen, Jr., Mark Cyrus Hipp, Christopher Everett Brook, aka "Blue," Keith Deondray Young, aka "Tugg," Larry Gene Keen, aka "Junior," Carla Thomas Hawkins, aka "Breeze," Courtney Breanne McMullen, Chase Anthony Hagler, Andre Lamont Williams, aka "Dre," Jessica Milleson and Heather Rebecca Beck, the defendants herein, did knowingly, intentionally and unlawfully, combine, conspire, confederate, and agree with each other and with others, both known and unknown to the United States Grand Jury, to violate a law of the United States of America, to wit, 21 U.S.C. § 841(a)(1), prohibiting the possession with intent to distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance, as set forth hereinafter.

COUNT TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about February 6, 2010, in the Eastern District of Texas, **Christopher Everett Brook**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Forgery, in Cause # 26519-B, 124th Judicial District Court, Gregg County, Texas, on October 18, 1999;
- (2) Criminal mischief over \$1,500, in Cause # 28618-A, 188th Judicial District Court, Gregg County, Texas, on April 12, 2002; and
- (3) Hindering apprehension, in Cause # 241-1544-06, 241st Judicial District Court, Smith County, Texas, on November 2, 2007,

did knowingly and intentionally possess a firearm, to wit:

a Ruger, model P89DC, 9mm pistol, serial number 307-16743, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 5, 2013, in the Eastern District of Texas, **Devon Vernon**Harris, aka "Cali," the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be Indictment - Page 3

prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 5, 2013, in the Eastern District of Texas, **Devon Vernon**Harris, aka "Cali," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Possession of a controlled substance, in Cause # 26800-A, 188th Judicial District Court, Gregg County, Texas, on August 14, 2000

did knowingly and intentionally possess firearms, to wit:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT FIVE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 5, 2013, in the Eastern District of Texas, Andre Lamont Williams, aka "Dre," the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Glock, 19, 9mm pistol, serial number NHA809;
- (2) Sun Dance Industries, .22 caliber handgun, serial number D001237;
- (3) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141; and
- (4) Six magazines containing 71 rounds of 9mm ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT SIX

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about March 17, 2014, in the Eastern District of Texas, Cynthia Beth

Brantley, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Theft of property over \$1500, in Cause # 29151-B, 124th Judicial District Court, Gregg County, Texas, on April 5, 2002;
- (2) Delivery of a controlled substance, in Cause # 32293-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005;
- (3) Delivery of a controlled substance, in Cause # 32295-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005;
- (4) Delivery of a controlled substance, in Cause # 32297-B, 124th Judicial District Court, Gregg County, Texas, on July 22, 2005; and
- (5) Possession of a controlled substance, in Cause # 36331-B, 124th Judicial District Court, Gregg County, Texas, on April 11, 2008,

did knowingly and intentionally possess a firearm, to wit:

a Davis Industries, T380, .380 caliber pistol, serial number AP52840, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT SEVEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about April 2, 2014, in the Eastern District of Texas, Mark Cyrus Hipp, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

(1) Burglary of a building, in Cause # 98-H-157-SJ, 23rd Judicial District Court, Matagorda County, Texas, on November 10, 1999, with order revoking probation;

- (2) Forgery, in Cause # 99-H-124-SJ, 23rd Judicial District Court, Matagorda County, Texas, on July 8, 1999, with order revoking probation; and
- (3) Failure to stop and render aid, in Cause # 99-06-8380, 25th Judicial District Court, Lavaca County, Texas, on July 18, 2000,

did knowingly and intentionally possess a firearm, to wit:

an RG, RG38, .38 caliber revolver, serial number FF371879, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT EIGHT

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about April 21, 2014, in the Eastern District of Texas, Stephen Dwayne Cannada, aka "Little Wood" the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Ruger, SR9, 9mm pistol, serial number 334-63439, together with ammunition, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT NINE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about April 21, 2014, in the Eastern District of Texas, **Stephen Dwayne**Cannada, aka "Little Wood," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Delivery of a simulated controlled substance, in Cause #2040120, 147th Judicial District Court, Travis County, Texas, on May 4, 2004;
- (2) Robbery, in Cause # F-0859241-J, Criminal District Court # 3, Dallas County, Texas, on February 25, 2009; and
- (3) Possession of a controlled substance, in Cause #41979-B, 124th Judicial District Court, Gregg County, Texas, on May 2, 2013,

did knowingly and intentionally possess a firearm, to wit:

a Ruger, SR9, 9mm pistol, serial number 334-63439, together with ammunition, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about May 24, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

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Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, serial number NE309621,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT ELEVEN

Violation: 26 U.S.C. § 5861(d) (Possession of unregistered firearm)

On or about May 24, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," defendant herein, did knowingly and intentionally possess an unregistered firearm, to-wit:

A New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, serial number NE309621,

not registered to him in the National Firearms Registration and Transfer Record,

In violation of 26 U.S.C. §§ 5841, 5861(d) and 5871.

COUNT TWELVE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about July 12, 2014, in the Eastern District of Texas, **Stephen Dwayne**Cannada, aka "Little Wood," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Delivery of a simulated controlled substance, in Cause #2040120, 147th Judicial District Court, Travis County, Texas, on May 4, 2004;
- (2) Robbery, in Cause # F-0859241-J, Criminal District Court # 3, Dallas County, Texas, on February 25, 2009; and
- (3) Possession of a controlled substance, in Cause #41979-B, 124th Judicial District Court, Gregg County, Texas, on May 2, 2013,

did knowingly and intentionally possess a firearm, to wit:

a Jimenez Arms, JA22, .22 caliber pistol, serial number 1205360, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 6, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, did knowingly and intentionally use, carry, and possess a

firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Taurus, PT111 Millenium Pro, 9mm pistol, serial number TDR40332, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT FOURTEEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 6, 2014, in the Eastern District of Texas, Michael Dain Bonner, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Attempted violation of protective order, in Cause #32218-B, 124th Judicial District Court, Gregg County, Texas, on October 28, 2004; and
- (2) Possession with intent to distribute methamphetamine, in Cause #6:09CR9-08, United States District Court, Eastern District of Texas, on February 5, 2010,

did knowingly and intentionally possess a firearm, to wit:

a Taurus, PT111 Millenium Pro, 9mm pistol, serial number TDR40332, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT FIFTEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about August 8, 2014, in the Eastern District of Texas, **David Franklin Beck**, **Jr.**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT SIXTEEN

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 8, 2014, in the Eastern District of Texas, **David Franklin Beck**, **Jr.**, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Sexual assault, child, in Cause # F-9832508-KR, 265th Judicial District Court, Dallas, Texas, on February 16, 2001,

did knowingly and intentionally possess a firearm, to wit:

a Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT SEVENTEEN.

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about August 17, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Remington, 870, 12 gauge short barrel shotgun, serial number D019337M, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT EIGHTEEN

Violation: 26 U.S.C. § 5861(d) (Possession of unregistered firearm)

On or about August 17, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," defendant herein, did knowingly and intentionally possess an unregistered firearm, to-wit:

a Remington, 870, 12 gauge short barrel shotgun, serial number D019337M, together with ammunition,

not registered to him in the National Firearms Registration and Transfer Record,

In violation of 26 U.S.C. §§ 5841, 5861(d) and 5871.

COUNT NINETEEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 16, 2014, in the Eastern District of Texas, Christopher Everett Brook, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, Christopher Everett Brook, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Forgery, in Cause # 26519-B, 124th Judicial District Court, Gregg County, Texas, on October 18, 1999;
- (2) Criminal mischief over \$1,500, in Cause # 28618-A, 188th Judicial District Court, Gregg County, Texas, on April 12, 2002;
- (3) Hindering apprehension, in Cause # 241-1544-06, 241st Judicial District Court, Smith County, Texas, on November 2, 2007;
- (4) Possession of a controlled substance, in Cause # 39397-B, 124th Judicial District Court, Gregg County, Texas, on May 21, 2010; and
- (5) Possession of a controlled substance, in Cause # 10-0287X, 71st Judicial District Court, Harrison County, Texas, on August 4, 2010,

did knowingly and intentionally possess a firearm, to wit:

a Bryco, model 48, .380 pistol, serial number 567598, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-ONE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 16, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Bryco, model 48, .380 pistol, serial number 567598, which had been shipped and transported in interstate commerce, In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 16, 2014, in the Eastern District of Texas, Carla Thomas Hawkins, aka "Breeze," the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Bryco, model 48, .380 pistol, serial number 567598, In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 16, 2014, in the Eastern District of Texas, Carla Thomas

Hawkins, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (a) Possession of a controlled substance, in Cause # 007-2207-03, 7th Judicial District Court, Smith County, Texas, on February 26, 2007; and
- (b) Credit card abuse, in Cause # 41802-A, 188th Judicial District Court, Gregg County, Texas, on October 2, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Bryco, model 48, .380 pistol, serial number 567598, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-FIVE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 23, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-SIX

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 23, 2014, in the Eastern District of Texas, **Michael Dain Bonner**, the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Attempted violation of protective order, in Cause #32218-B, 124th Judicial District Court, Gregg County, Texas, on October 28, 2004; and
- Possession with intent to distribute methamphetamine, in Cause #6:09CR9-08, United States District Court, Eastern District of Texas, on February 5, 2010,

did knowingly and intentionally possess firearms, to wit:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-SEVEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about September 23, 2014, in the Eastern District of Texas, **Courtney Breanne McMullen**, the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603; and
- (2) L.C. Smith shotgun, no serial number,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT TWENTY-EIGHT

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about September 23, 2014, in the Eastern District of Texas, Courtney

Breanne McMullen, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Theft with prior conviction (revoking probation), in Cause #41441-B, 124th Judicial District Court, Gregg County, Texas, on June 6, 2014,

did knowingly and intentionally possess firearms, to wit:

- (1) Harrington & Richardson, model 922, .22 revolver, serial number 160603;
- (2) L.C. Smith shotgun, no serial number,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT TWENTY-NINE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about October 21, 2014, in the Eastern District of Texas, Broderick Lamail Jones, aka "BA," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Possession of a controlled substance, in Cause # 14025, 115th Judicial District Court, Upshur County, Texas, on August 25, 2009; and
- (2) Manufacture/Delivery of a controlled substance, in Cause # 15227, 115th Judicial District Court, Upshur County, Texas, on August 25, 2009,

did knowingly and intentionally possess a firearm, to wit:

a Raven Arms, MP25, .25 caliber pistol, serial number 935862, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about October 30, 2014, in the Eastern District of Texas, Larry Gene Keen, aka "Junior," the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Unauthorized Use of Motor Vehicle, in Cause # CR 09-092, 4th Judicial District Court, Rusk County, Texas, on October 1, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Boito, 410 shotgun, 26" overall, 18" barrel, serial number 443593, which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY-ONE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about November 6, 2014, in the Eastern District of Texas, **Keith Deondray Young, aka "Tugg,"** the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II

controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-TWO

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about November 6, 2014, in the Eastern District of Texas, **Keith Deondray**Young, aka "Tugg," the defendant herein, having been convicted of offenses punishable by a term of imprisonment exceeding one year, specifically:

- (1) Theft of a firearm, in Cause # 25878-A, 188th Judicial District Court, Gregg County, Texas, on December 7, 1999;
- (2) Credit card abuse, in Cause # 33822-A, 188th Judicial District Court, Gregg County, Texas, on January 17, 2006;
- (3) Possession of a controlled substance, in Cause # 35552-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007;
- (4) Assault family violence (enhanced), in Cause # 35575-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007; and
- (5) Delivery of a controlled substance, in Cause # 41194-A, 188th Judicial District Court, Gregg County, Texas, on May 24, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

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which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY-THREE

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about November 19, 2014, in the Eastern District of Texas, Keith Deondray Young, aka "Tugg," the defendant herein, did knowingly and intentionally use, carry, and possess a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-FOUR

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about November 19, 2014, in the Eastern District of Texas, **Keith Deondray**Young, aka "Tugg," the defendant herein, having been convicted of offenses punishable
by a term of imprisonment exceeding one year, specifically:

- (1) Theft of a firearm, in Cause # 25878-A, 188th Judicial District Court, Gregg County, Texas, on December 7, 1999;
- (2) Credit card abuse, in Cause # 33822-A, 188th Judicial District Court, Gregg County, Texas, on January 17, 2006;
- (3) Possession of a controlled substance; in Cause # 35552-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007;
- (4) Assault family violence (enhanced), in Cause # 35575-A, 188th Judicial District Court, Gregg County, Texas, on May 8, 2007; and
- (5) Delivery of a controlled substance, in Cause # 41194-A, 188th Judicial District Court, Gregg County, Texas, on May 24, 2012,

did knowingly and intentionally possess a firearm, to wit:

a Glock, model 27, .40 caliber pistol, serial number LWN777, together with ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

COUNT THIRTY-FIVE

Violation: 18 U.S.C. § 922(g)(1) and 924(a)(2), (Felon in possession of a firearm)

On or about December 15, 2014, in the Eastern District of Texas, **David Franklin Beck, Jr.**, the defendant herein, having been convicted of an offense punishable by a term of imprisonment exceeding one year, specifically:

Sexual assault, child, in Cause # F-9832508-KR, 265th Judicial District Court, Dallas, Texas, on February 16, 2001,

did knowingly and intentionally possess firearms, to wit:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;
- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and
- (12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

which had been shipped and transported in interstate commerce,

In violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).

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COUNT THIRTY-SIX

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about December 15, 2014, in the Eastern District of Texas, **David Franklin Beck, Jr.**, the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;
- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and

(12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

COUNT THIRTY-SEVEN

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a firearm during and in furtherance of a drug trafficking crime)

On or about December 15, 2014, in the Eastern District of Texas, **Heather Rebecca Beck**, the defendant herein, did knowingly and intentionally use, carry, and possess firearms during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, that is possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, as charged in Count One of this indictment, in violation of 21 U.S.C. § 846, and in furtherance of said crime possessed:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition;
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition;
- (3) Smith & Wesson, model SW9VE, 9mm pistol, serial number PDX7408, together with magazine and ammunition;
- (4) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition;
- (5) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition;
- (6) Inter Arms, model Virginian, .357 caliber revolver, serial number A01476, together with ammunition;
- (7) Navy Arms, 12 gauge shotgun, serial number 109308;

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- (8) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition;
- (9) .38 caliber revolver, manufactured in Belgium;
- (10) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564;
- (11) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition; and
- (12) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition,

In violation of 18 U.S.C. § 924(c)(1)(B).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE Pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, & 28 U.S.C. §2461

As the result of committing one or more of the foregoing offenses alleged in this indictment, the defendants herein shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461:

- 1. any property constituting, or derived from, and proceeds the defendants obtained, directly or indirectly, as the result of such violations;
- 2, any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations, and/or;
- 3. any and all firearms, ammunition and accessories seized from the defendants, including but not limited to the following:

FIREARMS:

Seized from David Franklin Beck, Jr. and Heather Rebecca Beck:

- (1) Smith & Wesson, model MP 15-22, .22 caliber assault rifle, serial number DWH7388, together with two magazines and ammunition
- (2) Winchester, model 50, 12 gauge shotgun, serial number 53383, together with ammunition
- (3) High Standard, model DM-101, .22 caliber derringer, serial number 1831704, together with ammunition
- (4) Ruger, Mark I, .22 caliber pistol, serial number 1398484, together with magazines and ammunition

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- (5) Navy Arms, 12 gauge shotgun, serial number 109308
- (6) Savage Arms, model 93R17, .17 caliber rifle, serial number 903025, together with magazines and ammunition
- (7) .38 caliber revolver, manufactured in Belgium
- (8) Ruger, model Single Six, .22 caliber revolver, serial number 66-96564
- (9) Smith & Wesson, model SW9VE, 9mm pistol, serial number DVB2033, together with magazines and ammunition
- (10) Colt, model M4, .22 caliber assault rifle, serial number BP085392, together with magazines and ammunition
- (11) 13 rounds of 12 gauge ammunition
- (12) 355 rounds of .22 caliber ammunition
- (13) 1262 rounds of various caliber ammunition
- (14) 11 rounds with two magazines of .223 caliber ammunition

Seized from Stephen Dwayne Cannada, aka "Little Wood"

- (1) Smith and Wesson, model 10, .38 revolver, obliterated serial number
- (2) Smith and Wesson, model 10, .38 revolver, serial number C774147
- (3) Jimenez Arms, JA22, .22 caliber pistol, serial number 1205360, together with ammunition
- (4) Ruger, SR9, 9mm pistol, serial number 334-63439, together with ammunition

Seized from Larry Gene Keen, aka "Junior"

- (1) Remington, 870, 12 gauge short barrel shotgun, serial number D019337M, together with ammunition
- (2) New England Firearms, SB1 Pardner, 12 gauge short barrel shotgun, serial number NE309621

Seized from Devon Vernon Harris, aka "Cali"

- (1) Sun Dance Industries, .22 caliber handgun, serial number D001237
- (2) Cobray, M12, .380 Uzi type handgun, serial number 12-0001141
- (3) Six magazines containing 71 rounds of 9mm ammunition

Seized from Cynthia Beth Brantley

Davis Industries, T380, .380 caliber pistol, serial number AP52840, together with ammunition

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U. S. CURRENCY:

\$5,230.00 United States currency, seized from David Franklin Beck, Jr.

CASH PROCEEDS

\$200,000 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate is proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations.

Substitute Assets

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461.

Cases 6: 151-6r-0000048-R-CHXIMMH HD00umente656.-4Filede12/20/1461 (Page 8230f 852Page 4D044) 2/4208

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A TRUE BILL

BK

GRAND JURY FOREPERSON

JOHN M. BALES

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(903) 590-1439 (fax)

1-21-2015

Date

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

UNITED STATES OF AMERICA	§		
$\mathbf{V}_{\boldsymbol{\cdot}}$	<i></i>		8
MICHAEL DAIN BONNER (01)	8		
DAVID FRANKLIN BECK, JR. (02)	§		
MICHAEL DEWAYNE JONES,	§		
aka "Sleepy" (03)	§		
STEPHEN DWAYNE CANNADA, (04)	- §		
aka "Little Wood"	S		
CYNTHIA BETH BRANTLEY (05)	S		
DEVON VERNON HARRIS, aka "Cali" (06)	0000000		
DAVID WAYNE CARLISLE, (07)	§		
aka "Drop"	\$	CRIMINAL NO. 6:15CR	
BRODERICK LAMAIL JONES, (08)	§	-	
aka "BA"	§	JUDGE	
KATLIN QUATEZ GODFREY, (09)	§		
aka "Slim/KG"	§		
TROY OWEN, JR. (10)	§		
MARK CYRUS HIPP (11)	§		
CHRISTOPHER EVERETT BROOK, (12)	§		
aka "Blue"	\$ \$ \$		
KEITH DEONDRAY YOUNG, (13)	§		
aka "Tugg"	§		
LARRY GENE KEEN, aka "Junior" (14)	§		
CARLA THOMAS HAWKINS, (15)	§ §		
aka "Breeze"	§		
COURTNEY BREANNE MCMULLEN (16)	§		
CHASE ANTHONY HAGLER (17)	§ §		
ANDRE LAMONT WILLIAMS, (18)	§		
aka "Dre"	§ §		
JESSICA MILLESON (19)	§		
HEATHER REPECCA RECK (20)	2		

NOTICE OF PENALTY

Cases 6: 15:1-6r-0000043-R-CHXIN MH HD00umente656.-4Filede12/20/1461 (Page (843of 852Page HD) ##D 221.0

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COUNT 1

Violation: 21 U.S.C. § 846 (Conspiracy to possess with intent to

distribute and distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance)

Penalty: Imprisonment for a term of not less than 10 years or

more than life, a fine not to exceed \$10,000,000, or both. A term of supervised release of at least 5 years in

addition to such term of imprisonment.

Special Assessment: \$100.00

COUNTS 3, 5, 6, 9, 14, 16, 20, 22, 24, 26, 28, 32, 34, & 37

Violation: 18 U.S.C. § 924(c) (Use, carrying, and possession of a

firearm during and in furtherance of a drug trafficking

crime)

Penalty: Imprisonment for a term of not less than 5 years or more

than life, which must be served consecutively to any other term of imprisonment, a fine not to exceed \$250,000, or both. A term of supervised release of not

more than 5 years in addition to such term of

imprisonment.

In the case of a second or subsequent conviction of this offense, the term of imprisonment shall not be less than

25 years.

Special Assessment:

\$100.00

COUNTS 2, 4, 7, 8, 10, 11, 13, 15, 17, 18, 21, 23, 25, 27, 29, 30, 31, 33, 35, 36 & 38

Violation:

18 U.S.C. § 922(g)(1) (Felon in Possession of a

Firearm)

Penalty:

Imprisonment for a term of not more than 10 years, a

fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years in addition

to such term of imprisonment.

Special Assessment:

\$100.00

COUNTS 12 & 19

Violation:

26 U.S.C. § 5861(d) (Possession of an Unregistered

Firearm)

Penalty:

Imprisonment for a term of not more than 10 years, a

fine not to exceed \$250,000, or both. A term of supervised release of not more than 3 years in addition

to such term of imprisonment.

Special Assessment:

\$100.00